

THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Norman Chan,)	
)	
Plaintiff,)	
)	
v.)	
)	
Michaels Stores, Inc.)	
)	Case No. 08CV3851
Defendant.)	
)	Judge Gottschal
)	Magistrate Judge Valdez
)	
)	

**AGREED MOTION FOR EXTENSION OF TIME FOR DEFENDANT
TO ANSWER OR OTHERWISE PLEAD**

Defendant MICHAELS STORES, INC. ("Defendant"), by and through its undersigned attorneys and pursuant to Rule 6 of the Federal Rules of Civil Procedure hereby moves for an order granting it an additional 21 days after the date of this filing, until and including **August 27, 2008**, to answer or otherwise plead in this matter. In support hereof, Defendant states as follows:

1. Plaintiff filed his Complaint in this Court on July 7, 2008, alleging claims under Title VII and the ADEA and Defendant was served thereafter.
2. Defendant's counsel only recently received the Complaint, and is currently in the process of investigating the allegations of the Complaint so that Defendant may submit an appropriate response. Defendant's counsel believes that 21 days should be

sufficient to complete this process in a fashion that will allow them to file an appropriate responsive pleading on behalf of Defendant.

3. Plaintiff's counsel Michael T. Smith has been contacted and has agreed to this requested extension.

4. This motion is made upon the grounds stated and not for the purpose of delay.

Respectfully submitted,

Michaels Stores, Inc., *Defendant*

By: s/ Michael D. Ray
One of Their Attorneys

Richard L. Samson (IL ARDC No. 6191450)
Michael D. Ray (IL ARDC No. 6285109)
OGLETREE, DEAKINS, NASH,
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(312) 558-1220

Dated: August 6, 2008

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that on August 6, 2008, he caused to be electronically filed the foregoing Motion for Extension of Time to Answer or Otherwise Plead. Notice of this filing will be sent via the Court's electronic filing system to:

Michael T. Smith, Esq.
440 W. Irving Park Rd.
Roselle, IL 60172
(847) 895-0626

s/ Michael D. Ray

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